

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-MJ- 8395 (RMM)

UNITED STATES OF AMERICA

vs.

MAHANDRA SOOKRAM,

Defendant.

FILED BY SP D.C.

Sep 6, 2022

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)?
 Yes X No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes X No

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By: Lara Treinis Gatz
Lara Treinis Gatz
Assistant United States Attorney
Southern District of Florida
Court ID No. A5502857
500 S. Australian Avenue – 4th Floor West
West Palm Beach, Florida 33401
lara.gatz@usdoj.gov
(561) 209-1069

UNITED STATES DISTRICT COURT

for the

Southern District of Florida



United States of America

v.

MAHANDRA SOOKRAM,

Case No. 8395

22-MJ- (RMM)

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ANGELA E. NOBLE
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Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 31, 2022 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

8 USC 1324(a)(1)(A)(i)

Bringing aliens into to the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.JOSHUA J
WOODBURYDigitally signed by JOSHUA J
WOODBURY

Date: 2022.09.05 11:16:13 -04'00'

Complainant's signature

Special Agent Joshua Woody, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/05/2022

Judge's signature

City and state: West Palm Beach, Florida

HONORABLE RYON M. McCABE, USMJ

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joshua Woodbury, first being duly sworn, does hereby depose and state as follows:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) and have been so employed since June 2008. Prior to my employment with HSI, I worked as a United States Customs Inspector for six and a half years. As part of my duties and responsibilities as an HSI Special Agent, I have become familiar with the criminal offenses set forth in Title 8 of the United States Code, the Immigration and Nationality Act. Moreover, I have conducted investigations involving human smuggling and their related criminal activity and have become familiar with the methods and schemes employed by individuals who smuggle persons into the United States.

2. The facts set forth in this affidavit are based on my personal knowledge, information obtained from others, including other law enforcement officers, my review of documents, pictures, GPS data, text messages and computer records. Because this affidavit is being submitted for the limited purpose of establishing probable cause to support a criminal Complaint, I have not included each and every fact known to me and law enforcement, rather, I have included only those facts necessary to establish probable cause to believe that, on or about August 31, 2022, defendant MAHANDRA SOOKRAM did knowingly and willfully bring and attempt to bring aliens to the United States in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i).

PROBABLE CAUSE

3. On August 31, 2022, at approximately 9:30 p.m. Customs and Border Protection (CBP) Air and Marine became aware of a vessel approximately 20 nautical miles east of the Lake Worth Inlet, and then at approximately 10:15 p.m. stopped that vessel. CBP officers

observed the defendant MAHANDRA SOOKRAM (“SOOKRAM”) piloting the vessel, which was carrying six passengers. Upon questioning, defendant SOOKRAM advised CBP officers that they were returning to West Palm Beach from a day of fishing. Defendant SOOKRAM further advised that he was a U.S. Citizen, while the other six individuals reported to CBP officers that they were Guyanese nationals.

4. Thereafter, during a search of the vessel, CBP officers discovered airplane boarding passes dated August 31, 2022 in the names of the six Guyanese nationals aboard the vessel which documented travel earlier that day from Georgetown, Guyana to Port of Spain Trinidad and Tobago, with a final destination of Freeport, Bahamas. Further, a review of the GPS device located on the vessel recorded the vessel departing a Marina located in Palm Beach County, Florida¹ at approximately 6:40 a.m. that day, and arriving at the Old Bahama Bay resort at West End, Bahamas at approximately 9:40 a.m. Then, at 8:05 p.m., the vessel departed the West End, Bahamas and headed due west towards the United States, returning to Lake Worth Inlet.

5. Then, at approximately 8:30 p.m. on September 2, 2022, defendant SOOKRAM was brought to the Coast Guard Station in Lake Worth to be processed and interviewed by HSI Agents. After being advised of his Miranda rights, which he waived, agreeing to answer questions, defendant SOOKRAM said, in sum and in part, that he left Lake Worth in the early morning hours to go to Freeport, Bahamas because he has not seen his daughter in over twenty years. Defendant SOOKRAM said he wanted to bring his daughter and her son to the coast of the United States to see the lights and that he thought the coast of the United States was 3 miles

¹ Defendant SOOKRAM’s vehicle with an attached boat trailer was later located in the parking lot of the Marina.

offshore. Defendant SOOKRAM further told agents that the other people on the vessel were his daughter's ex mother-in-law, his daughter's boyfriend, and friends his daughter's boyfriend. Defendant SOOKRAM stated that he intended to return everyone back to the Bahamas. Then, when agents asked defendant SOOKRAM to clarify where in the Bahamas he went that day, defendant SOOKRAM admitted he actually went to West End and not Freeport. Finally, when confronted with several inconsistencies in his story, defendant SOOKRAM declined to answer further questions.

6. As part of the investigation, law enforcement officers conducted database checks concerning the six Guyanese nationals located on the vessel and discovered that two of the people on board were previously denied visas to enter the United States as it was determined their intentions were not to come to the United States as visitors, but as intended immigrants.

7. Further, a review of defendant SOOKRAM's cellphone reveals text message communications between himself, and someone listed as "David NY." In July 2022 text message exchanges between the two, defendant SOOKRAM advised that he had an "opening next month" for a friend of David's, and, during further communications, the two discuss "payment." Then, in an August 29, 2022 text exchange, David NY sent defendant SOOKRAM a picture of a biographic page of a Guyanese passport for an individual whose identity is known to your affiant, hereafter referred to as RR. RR was one of the aliens found on the vessel on August 31, 2022, and is one of the two individuals previously denied a visa to enter the United States.

8. Also located on defendant SOOKRAM's cellphone were text message exchanges directly between defendant SOOKRAM and RR. In particular, on July 21, 2022,

defendant SOOKRAM sent RR a text message stating, “David gave me your number, I’m the guy who will be bringing you,” to which RR responded, “ok cool let me know what I have to do.” Then, on August 4, 2022, RR sent defendant SOOKRAM a text message stating, “I didn’t get anyone as of yet who wants to come, I asked two persons, but they are scared to take the risk,” to which defendant SOOKRAM replied, “everything is good we are full I will give you a call at 8.” Then, on August 7, 2022, defendant SOOKRAM sent RR photographs of the biographical pages of passports of four individuals (who were also found on the vessel on August 31, 2022) and stated, “these are the people you will be traveling with.” Then, on August 31, 2022, at approximately 3:48 p.m. defendant SOOKRAM sent RR pictures of the vessel, and, at approximately 6:57 p.m. RR responded, “we are on our way,” to which defendant SOOKRAM replied “go to the West End clinic right by the boat ramp tell the driver that.”

9. Finally, multiple text message exchanges were located on defendant SOOKRAM’s cellphone in which, between July and August 2022, various individuals discuss paying defendant SOOKRAM to transport them to the United States (including some of the individuals found on the vessel on August 31, 2022). It appears from the text messages exchanges that defendant SOOKRAM charged \$10,000 per person for his smuggling services.

10. Based on the foregoing, I submit that probable cause exists to believe that, on or about August 31, 2022, defendant MAHANDRA SOOKRAM brought and attempted to

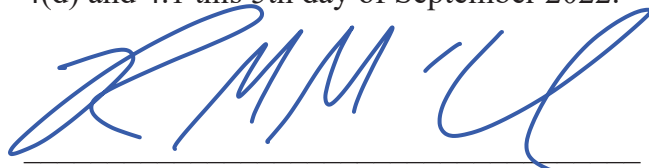
bring aliens to the United States in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i).

JOSHUA J
WOODBURY

Digitally signed by JOSHUA J
WOODBURY
Date: 2022.09.05 11:15:21
-04'00'

JOSHUA WOODBURY
Special Agent
Homeland Security Investigations

Sworn and Attested to me by Applicant by Telephone (Facetime) pursuant to Fed. R. Crim. P. 4(d) and 4.1 this 5th day of September 2022.



THE HONORABLE RYON M. McCABE
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: MAHANDRA SOOKRAM

22 - mj - 8395 - RMM

Case No: _____

Bringing Aliens into the United States Title 8, United States Code, § 1324(a)(1)(A)(i)

*** Max. Term of Imprisonment: 10 Years**

*** Mandatory Min. Term of Imprisonment (if applicable):**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
8395

Case Number: 22-MJ- (RMM)

BOND RECOMMENDATION

DEFENDANTS: MAHANDRA SOOKRAM

PRETRIAL DETENTION

(Personal Surety)(Corporate Surety) (Cash) (**Pretrial
Detention**)

By: Lara Treinis Gatz
LARA TREINIS GATZ
ASSISTANT U.S. ATTORNEY

Last Known Address: 5700 Soloman Road, Jacksonville, Florida

What Facility: Palm Beach County Jail 3228 Gun Club Rd, West Palm Beach, FL 33406

Agent(s): SPECIAL AGENT JOSHUA WOODBURY, HSI
(FBI)(SECRET SERVICE)(DEA)(IRS)(ICE)(**OTHER**)